

District of
UNITED STATES GOVERNMENT COURT

NORTHERN District of GEORGIA
Atlanta Division

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U.S.D.C. - Atlanta

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APR 03 2017

JAMES N. HATTEN, Clerk
By: *[Signature]* Deputy Clerk

Plaintiffs,

vs

- 1 Barbara Hunt
2 Harpo
3 Lionsgate Entertainment
4 Oprah Winfrey Network
(OWN)
5 Oprah Winfrey
6 Tyler Perry Company
7 Tyler Perry Studios (TPS)
8 Tyler Perry aka Emmett
Perry Jr. aka Emmett J.
Perry aka Buddy aka John
Ivory (all other Aliases)
Defendants _____

1:17-CV-1181

CIVIL ACTION NO. _____

:
VERIFIED COMPLAINT FOR
DECLATORY AND INJUNCTIVE
RELIEF AND DAMAGES FROM
RACKETEERING, CONSPIRACY
TO ENGAGE IN A PATTERN OF
RACKETEERING ACTIVITY
AND RELATED CLAIMS;

JURY DEMANDED

CIVIL RICO
18 U.S.C. 1961 and 1964
DIVERSITY
28 U.S. Code § 1369
SHERMAN ANTI-TRUST
CLAYTON ANTI-TRUST
U.S. CONSTITUTION

**CIVIL LAWSUIT: RACKETEERING INFLUENCED AND
ORGANIZATIONS ACT (RICO), SHERMAN ACT, CLAYTON ACT**

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Emmitt R. Perry aka Emmett
T. Perry aka Willie M. Perry
aka Emmett Ty Perry aka
Emmett Perry aka Tyler E
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Initial COMPLAINT for Civil RICO Remedies

**CIVIL LAWSUIT: RACKETEERING INFLUENCED AND
ORGANIZATIONS ACT (RICO), SHERMAN ACT, CLAYTON ACT**

A. INTRODUCTION

1. This is a complex civil action for Racketeering Influenced and Organizations Act (RICO) remedies authorized by the federal statutes at 18 U.S.C. 1961 1(a) and 1(b) *et seq.*; for declaratory and injunctive relief; for actual, exemplary (punitive) damages; and for all other relief which this honorable District Court deems just and proper under all circumstances which have occasioned this Initial COMPLAINT. See, 18 U.S.C. §§ 1964(a) and (c) (“Civil RICO”). The primary cause of this action is that the Defendants conspired in a widespread criminal enterprise operating as a cartel under legal businesses engaging in patterns of racketeering activities and organized crime across State and international lines; conspiring to engage in racketeering activity involving numerous RICO predicate acts during the past ten (10) calendar years or more. (See, Exhibit A, pp.2)

2. The predicate acts cluster around criminal copyright plagiarism, trafficking counterfeit goods, tampering with and retaliation against qualified attorneys, obstructing justice. See, 18 U.S.C. §§ 2319, 2320, 1512, 1513, 2315, 1503, 1510, 1511 and 1581-1588, counterfeits, plagiarisms, threats, violence and forgeries. See 18 U.S.C. §§ 1341 and 1344, respectively.

Initial COMPLAINT for Civil RICO Remedies

[RICO] bring to bear the pressure of "Private Attorneys General." The objective in both the Clayton Act and RICO is the carrot of treble damages. See, *Agency Holding Corp. v. Malley-Duff & Associates*, Supreme Court Reporter 2759. See also 483 U.S. 143 at page 151 (1987). "private attorneys general," (See Exhibit B, pp.2)dedicated to eliminating racketeering activity. 3 Id., at 187 (citing *Malley-Duff*, 483 U.S., at 151) (civil RICO) The provision for treble damages. See, *Rotella v. Wood et al.*, 528 U.S. 549 (2000). Dasher v. Housing Authority of City of Atlanta, Ga., D.C.Ga., 64 F.R.D. 720, 722. *See also*, Equal Access to Justice Act.

B. JURISDICTION AND VENUE

3. The Federal District Court has Jurisdiction Pursuant to the Civil RICO remedies at 18 U.S.C 1964 and the holdings of the U.S. Supreme Court in the case of, *Sedima, S.P.R.L. v. Imrex Co., Inc.*, 473 U.S. 479 (1985)and the U.S. Court of Appeals for the Ninth Circuit in Lou v. Belzberg, 834 F.2d 730, hn. 4 (9th Cir. 1987), Plaintiffs invoke and charge Defendant's with this law for counterfeits over years of conspiracy and racketeering.

4. Jurisdiction is based upon federal question, to wit, the Copyright Act of 1976 and 1909 as amended. Title 17 506(a); 1201; 1202; and 1203, United States Code; Title 18 U.S. Code § 2319, the Defendants conspired in Criminal Plagiarism to commit copyright counterfeits of Plaintiff's

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Intellectual Properties “Lover’s Kill” hereinafter “LK” and “Bad Apples Can Be Good Fruit” hereinafter “BAGF” as; Model Penal Code §§ 220.1–.3 (1962). (See, Exhibit C, pp. 3)

6. The Sherman Antitrust Act, 15 U.S.C. §§ 1–7 is a landmark federal statute in the history of the United States antitrust law or (“competition law”) passed by Congress in 1890. *United States v. Paramount Pictures, Inc.*, 334 US 131 (1948) (See, Exhibit D, pp.5) (The Defendants executed a violation of the Hollywood Antitrust Case of 1948. The Defendants conspired to monopolise the television and film industry; by owning the Studios and television network, counterfeiting the writings of enslaved copyright owners throughout the country, starring in counterfeited works as their own and entering into exclusive deals with one another. Monopoly Section 2 of the Act forbade monopoly. Clayton Antitrust Act Clayton Act, 15 U.S.C. §§ 12-27, 29 U.S.C. §§ 52-53.

7. The U.S. Constitution – 1ST Amendment, Title 42, Part VII, Ch. 83 and Sub-Chapter A, Using name or likeness (1) Invasion of Privacy of name and likeness (2) Violation of the Right of Publicity; Plaintiff’s works were based on life experiences. Article 1, Section 8, (8) Defendant’s intentionally violated the Plaintiff’s exclusive copyrights by committing plagiarism to their respective writings and discoveries, Defendants acted in

Initial COMPLAINT for Civil RICO Remedies

concert of a conspiracy which violated the creative control of how the Plaintiff's works were articulated without an agreement.

8. Federal Conspiracy Law, two elements: (1) an exclusive agreement was signed between Tyler Perry aka Emmett Perry, Jr.(and all other known and unknown aliases); Oprah Winfrey in 2013; all Defendants inclusive (2) between two Executive Owners and Chief Principal decision makers.

Laundering drug money into a legal business enterprise, remove trade secrets, repeatedly from 1999 through 2017. Settlement agreements and court admissions serve as admissible evidence against all. The Hobbs Act - Civil Conspiracy 18 U.S.C. 371, The Defendants conspired to counterfeit, extort, plagiarize, threaten, cause defamation of character, retaliate, bully, forge, financially distress using Plaintiffs intellectual property gains.

United States v. Franks, 511 F.2d 25, 31 (6th Cir. 1975)

9. (WIPO), Copyright Treaty (WCT) (1996). The WIPO Copyright Treaty (WCT) is a special agreement under the Berne Convention The Distributer and known conspirator Lionsgate which committed RICO Act, mail fraud when moving digital counterfeit copies of the Forgery and plagiarized intellectual properties which were protected pursuant to the Title 17 U.S. Code 506(a) 18 U.S. Code 2319 and all other Criminal Copyright.

10. Venue 28 U.S. Code § 1391, Defendants are based in Atlanta, GA.

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11. 28 U.S. Code § 1369 Multiparty, Multiform Jurisdiction,

B. THE PARTIES

12. Plaintiff WILLIAM JAMES (“WJ”) (“PLAINTIFFS”) is a private adult who doing business address above; plaintiff is currently a Carpenter.

13. Plaintiff TERRI V. TUCKER (“PLAINTIFFS”) is a private adult formerly known as TERRI V. DONALD-STRICKLAND, TLO-REDNESS Who does business at the above address; plaintiff is currently employed with the United States Army.

14. Defendant Tyler Perry (“TP”) (“DEFENDANT”) and Cartel Boss is a private adult individual who owns/writes/dba for the Tyler Perry Studios (“TPS”) is a domestic private corporation doing business in this district, with its corporate headquarters in Atlanta, GA.

15. Defendant Oprah Winfrey (“OW”) (“DEFENDANT”) and Cartel Ring Leader is a private adult individual who owns/writes/dba for the Oprah Winfrey Network (OWN) a domestic public corporation doing business in California.

16. LIONSGATE ENTERTAINMENT (“DEFENDANTS) and Cartel Distributor is a company that is Public domestic corporation doing business in California.

17. BARBARA HUNT (DEFENDANTS) and Cartel Member is an adult a

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private citizen working as an executive Accountant for the HARPO studios in Chicago, Illinois.

18. The doctrine of respondent superior applies to all of the defendants.

Cause of Action

19. (1) that the defendants, Tyler Perry, Tyler Perry Studios, Oprah Winfrey, Oprah Winfrey Networks (OWN) received money from a pattern of racketeering activity such as; violations of properties protected under the copyright act, drug money, bribery, threats financial and physical, counterfeit and forgeries of intellectual property (2) invested that money in an enterprise of Tyler Perry Studios and Oprah Winfrey Network, (3) the enterprise affected interstate commerce, and (4) an injury resulting from the investment of racketeering income distinct from an injury caused by the predicate acts themselves. *Johnson v. GEICO Cas. Co.*, 516 F. Supp. 2d 351 (D. Del. 2007). C.

THE FACTS

20. PLAINTIFF, William James a citizen of the United States, Authored a screenplay entitled “Lover’s Kill” (hereinafter referred to as “LK”).

21. PLAINTIFF, Terri Tucker aka (Donald-Strickland) a citizen of the United States, authored a book entitled “Bad Apples Can Be Good Fruit.” (BAGF) book. (hereinafter referred to as “BAGF”).

22 Plaintiffs discovered their original works plagiarized, counterfeited on a

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large scale of racketeering in approximately Early-March 2017.

23. During the investigation and research by Plaintiffs acting as "Private Attorney Generals, it was newly discovered that this was a large scale conspiracy on multiple Plaintiffs.

24. PLAINTIFF'S Plaintiff Terri Tucker contacted Plaintiff William James in February and compared the acts of plagiarism committed on each other's works and discovered the pattern of law proceedings and violations of law, cover-ups, briberies it was learned and investigated by the Plaintiff's that there was a pattern to the Intellectual Property plagiarisms; counterfeits and forgeries of their copyrighted works.

25. It was discovered by the Plaintiffs that a man named Melvin Childs who wrote in a book that Tyler Perry's first play tours was funded by drug dealers to fund the play that went on tour. This illegal operation laundered the drug money using the play and tour to put up a legal production studios in which served as a front for counterfeiting, forging and plagiarizing copyrighted works of hard working authors which resulted in the slavery of the copyright owners.

26. Tyler Perry publicly states he was beat by a man who was not his father, whereas as he changed his legal name at the age of 16 from Emmett Perry, Jr. to Tyler Perry Jr. We discovered he is still using several aliases of his birth name.

27. Oprah Winfrey discussed openly that she was abused sexually and

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physically and this is another basis in which formed the relationship of the conspiracy between Tyler Perry and Oprah Winfrey to engage in racketeering of intellectual copyrighted properties to grow their legal business brand using slavery and counterfeit, manufacturing of forged goods using the studios as the manufacturing laboratories and Lionsgate as the distributors. Tyler Perry and Oprah Winfrey (OWN) conspired an exclusive agreement OWN, a private company working with a Public company Tyler Perry Studios worked together in an effort and succeeded to monopolize the television and film industry while plagiarizing peoples copyrighted protected intellectual property. Violating the Sherman Anti-Trust Act, U.S. Copyright Act, engaging in RICO Activities, See below: (See, Exhibit E, p.1)

a. Case #2:99-cv-04592-MK Melvin Childs v Primus et al and Cartel member Tyler Perry, filed September 13, 1999, Jurisdiction was diversity; however Plaintiff failed to state a claim and case was dismissed without prejudice, Plaintiff provided a certificate in support of an Ex Parte Restraining Order. This shows Threats and retaliation by Tyler Perry.

b. Case# 2:02-cv-00175-JLG-MRA filed on February 26, 2002, Giant Eagle Inc. v Genesis Insurance Co, et. El, Tyler Perry was a Defendant. Diversity Case, in favor of Plaintiff on October 16, 2003.

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c. Case# 1:06-cv-00640-GET filed in Atlanta, GA filed on March 20, 2006 by Rolleston et al v Tyler Perry inflicted fear on a Diversity-Torts-to Land case. A Temporary Restraining Order was requested on May 01, 2006 threats escalated and on May 09, 2006 an EMERGENCY Motion for Permanent Injunction, Emergency Motion for Temporary Restraining Order by Rolleston and on May 12, 2006 a Motion for Recusal, Motion for Temporary Restraining Order Motion for Permanent Injunction and Emergency Motion for Permanent Injunction Emergency Motion for Temporary Restraining Order Submitted to District Judge G. Ernest Tidwell. Defendant TP.

c. Case#2:07-cv-00200-LED-JDL was filed on May, 21 2007 – Donna West v. Perry, West stated Tyler Perry watched her play “Fantasy of a Black Woman” because he created a counterfeit and forged copy of the play under the title “Diary of a Mad Black Woman” which became a plagiarized film. There was a trial. (Texas) however the Plaintiff could not place Defendant in Texas and we have newly discovered evidence, Defendant Emmett “Buddy” Perry, Jr. was in Texas at the time Plaintiff West was performing her play.

d. January 2008 – Plaintiff Terri Tucker sent both Tyler Perry and

Initial COMPLAINT for Civil RICO Remedies

Oprah Winfrey her book to use for a Movie. The company Tyler Perry Studios stated he requested an additional copy September 2008. William James stated June-2011 he provided his screenplay to Oprah Winfrey's Senior Accountant Barbara Hunt who wanted the other 2 copyrighted intellectual works. Lisa Daniels stated she provided Oprah Winfrey with her screenplay which became a television show for Tyler Perry. This conspiracy shows a pattern of trafficking intellectual property over the past 10 years amongst Defendants in concert. Lionsgate is the trafficker, international pirater and illegal intellectual goods distributor nationally and worldwide.

e. Case # 2:09-cv-08712-JFW-VBK filed on November 25, 2009 "Madea Goes to Jail sued by the estate of Bertha V. James v The Tyler Perry Company; Tyler Perry crime syndicate cartel member and Lionsgate Entertainment Corp trafficker distributor of counterfeit and manufacturer of forged goods.; Lions Gate Films, Inc. copyright plagiarism (California). Ended settlement agreement. (Admission to Guilt)

f. Case#2:10-cv-00784-GW-RZ Filed on February 03, 2010 – Johnny Tyrone Stringfield v Tyler Perry et el copyright plaigerism of a Television show "Meet the Browns. (California) Counterfeited and

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plagiarized a song for Tyler Perry Studios. On October 16, 2010 Settlement was reached. (Admission to Guilt)

g. Case# 2:11-cv-10099-UA-DUTY filed on December 06, 2011 Shamont Lyle Sapp v. Jamie Foxx and Tyler Perry; Tyler Perry Studios front for eliciting plagiarized intellectual property protected by copyrights registrations and Fox Broadcasting Network from an inmate. Case was Voluntarily Dismissed copyright plagiarism on May 10, 2012. (Settlement Admission to guilt or threatened to drop case)

h. Case# Whitehead v White & Case #5:12-cv-00399-RTH-MLH filed on February 10, 2012, L.L.P, et el \$75,000,000.00. The Defendants were a multitude of people to include, Tyler Perry, the distributor of counterfeit goods Lionsgate and the Head Ring Leader Oprah Winfrey who orchestrates the illegal activity. 440 Civil Rights SCCA 14-31224 and SCCA, 15-30348.

i. Case # 3:12-cv-00559-HES-MCR filed on May 09, 2012 - Maressa M. Holt, Plaintiff, v. Tyler Perry a/k/a John Ivory (Alias),.(United States District Court, M.D. Florida, Jacksonville Division). June 14, 2012. (copyright plagiarism) (Florida). The writer states her short stories and plays were plagiarized by Tyler Perry operating under a false name John Ivory.

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i. Case#2:12-cv-06629-HB filed on November 27, 2012- Terri Donald v Tyler Perry Studios and Lionsgate in (PA,) crime syndicates this case was out of compliance and defaulted pursuant to FR 12 & 55 answer was due by December 28, 2012 before the transfer from PA to New York on March 8, 2013. Attorney Simon Rosen served Tyler Perry and Lionsgate the same day the case was filed on November 27, 2012. The record is devoid of written request for extensions; request for transfer pursuant to 28 USC 1404(a) and any appearance by known attorney Tom J. Ferber. Oprah Winfrey initially received this book for the book club in 2008, Defendants signed an exclusive deal when case was dismissed 2013. Extortion and intimidation retaliation and threats were made to Plaintiffs attorney Simon Rosen. Enforcing Plaintiff in to slavery for working on the multimillion dollar plagiarized works. This RICO act violation also violates the Sherman Anti-trust Act since the companies refuse to allow writers to represent their own works and place the counterfeited works under registrations obtained from the copyrights offices in their names. Violating the competition Sherman Anti-Trust Act not allowing others to represent themselves and their own works, the conspiracy to defraud the government and laundering illegal funds gained to front legal businesses. (Audio Records Avail.)

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j. Case# 2:12-cv-00139-RLM-PRC filed on April 24, 2013

William James v Perry et al, Tyler Perry, Tyler Perry Studios company was used to plagiarize and counterfeit a forgery of his playwright, and trafficked by Lions gate Entertainment distribution interstate wide. For the film Temptation – Confessions of a Marriage Counselor (Indiana) Plaintiff James states he provided a copy Senior accountant at the Oprah Winfrey Studios (Oprah) who smuggled the intellectual property across state lines to the business partner Tyler Perry and conspired to produce the counterfeit film into a movie without compensation to playwright author, enforcing Plaintiff in to slavery for working on the multimillion dollar plagiarized works. This RICO act violation also violates the Sherman Anti-trust Act since the companies refuse to allow writers to represent their own works and place the counterfeited works under registrations obtained from the copyrights offices in their names. Violating the competition Sherman Anti-Trust Act not allowing others to represent themselves and their own works, the conspiracy to defraud the government and laundering illegal funds gained to front legal businesses.

k. Case# 4:14-cv-11374-MAG-RSW filed April 3, 2014

Parables Entertainment LLC v Tyler Perry Studios et al and Harpo

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Productions Inc. the two conspiring companies committed yet another act of copyright plagiarism – for the television show “The Haves and Have Not’s.” “Parables Entertainment” filed the lawsuit Thursday, April 3, in Flint U.S. District Court against Atlanta-based Tyler Perry Studios and the Oprah Winfrey-owned Harpo Productions over the show that airs on Winfrey's OWN television network. (Michigan-Flint) (Settlement-Admission to guilt.)

1. Case#1:14-cv-0261-RWS filed on July 16 2014, Ubiquitous Entertainment Studios v McPherson, Tyler Perry and Tyler Perry Studios. It was insinuated that Tyler Perry bribed an Official to underbid the company and obtained the facility, it was stated the technicality of failing to state a claim terminated the case.

m. Case#0:14-cv-04950-ADM-HB filed on December 08, 2014 by Selina Miller v Tyler Perry Production, Kanye West and Kim Kardashian. Breach of Contract. In the U.S. District Court St. Paul, MN. Neglect of Hollywood check (1 billion dollars) Wrong Jurisdiction and Plaintiff filed Forma Pauperis denied, personal injury for 100 million dollars.

n. Case #1:15-cv-01700-LMM-LTW filed on May 15, 2015 by Joshua Sole v Tyler Perry and Tyler Perry Studios, LLC and other known

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conspirators Tyler Perry had inappropriate communications with an employee Joshua Sole and filed a Countersuit to cover his illegal operations and to prohibit him from communicating private information on the operations of the organized criminal activities. Case dismissed because of failure to serve and not because allegations were unfounded.

n. Case#1:15-cv-03400-TWT filed on September 25, 2015 Terri Strickland v Tyler Perry, this case was appealed case#16-11601-AA awaiting a Rehearing and Rehearing En Banc showing Collateral Estoppel does not apply since he defaulted 4 times on the record according to FR 12 & 55.

o. October 2016 – Lisa Daniels Madea Gets a Job (Atlanta, GA)

p. Case#2:16-cv-00164-KS-JCG filed on October 11, 2016 by Otisa C. Strickland v Oprah Winfrey, and HARPO Studios (Hattiesburg, MS) for the television show “Iyanya Fix My Life” television show, Plaintiff was an attorney that shared her television show with Crime syndicate Oprah and she decided to enter into a settlement agreement in lieu of a voluntary dismissal and a compromise settlement on all matters of the claim on December 16, 2016. Oprah Winfrey

Due to the number of lawsuits and numerous years from 1992 through

Initial COMPLAINT for Civil RICO Remedies

current filed against the Cartel and Ring Leader Oprah Winfrey the exhibit will be attached exhibiting 95 separate lawsuits 10 which were Copyright intellectual property claims. (See, Exhibit F, pp.3)

28. In 2008 Plaintiff Tucker provided a copy of the BAGF to the Oprah Winfrey book club and the Tyler Perry Studios. In 2013 Plaintiff William James provided a copy of the script “Lover’s kill” to Oprah Winfrey. We found online an article that referred to a Lisa Daniels who stated she provided a copy of her work to Oprah Winfrey and in their conspiracy to defraud and counterfeit, Tyler Perry Studios is a front for his forged works.

29. Subsequent to the issuance of the copyright plagiarism suits against Defendants Tyler Perry and Oprah Winfrey the pattern of consecutive and continuous RICO violations go back as far as 1999 for Defendant Perry and 1992 for Defendant Winfrey the PLAINTIFF’s filed notice and lawsuits on the copyrighted work, however the Defendants eluded the federal law imposing the RICO act by committing the crimes in various states against unknown, low income intellectual owners. The Tyler Perry Studios located at 541 10th Street SW, Atlanta GA 30318 served as a front for manufacturing the plagiarized work. In both instances the Plaintiff’s stated the staff for Tyler Perry and Oprah Winfrey requested the Copyrighted Intellectual Property multiple times and

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counterfeited as well as; commercially released the films “Good Deeds” in 2012 and “Temptations” 2013 stating to the general public it was written by defendant Tyler Perry. A nexus in the case is that both Plaintiffs have also provided copies to Oprah Winfrey at the Harpo Studios in Chicago, Illinois.

30. Defendants Company Tyler Perry Studios had distribution deal with Lions Gate Entertainment and Oprah Winfrey owned Oprah Winfrey Network on cable, the organized criminals monopolized the industry with their exclusive contract violating the Sherman Anti-trust act when Tyler Perry TV shows were the only sitcoms aired other than Oprah Winfrey’s TV shows on prime time television cable broadcasting. Oprah is also using the distributor Lionsgate. Both Defendants films grossed over for the film “Good Deeds” \$35,000,000 box office, international \$553,386.00 and all DVD total sales were \$13,116,810.00 released February 2012 and “Temptations” \$51,975,354.00 box office, and all DVD total sales were \$14,906,103.00. There were 8 Copyright plagiarisms filed against Tyler Perry and 15 Copyright plagiarism’s cases filed against Oprah Winfrey. We believe that Oprah attempted to stop plagiarisms under her company and began to use Tyler Perry to continue the counterfeit of Intellectual Property.

31. The films is still being infringed upon to date as it is still being sold to

the general public and therefore Plaigerism there are no statute of limitations (SOL) on the RICO act.

32. Defendant is the owner of Tyler Perry Studios and ultimately owned by Emmett Perry, Jr. and is responsible for the actions of said company employees or owners. Defendant Oprah Winfrey Network (OWN) is a Public Company and both are engaging in organized crimes that have brought in up to 3 billion plus combined in revenues

a. The last action by the PETITIONER William James the last action was on April 15, 2014 NORTHERN DISTRICT OF Indiana claim Case # 2:13-cv-00139-RLM-PRC and terminated January 02, 2014.

b. The last action by the PETITIONER Tucker-Strickland in Appeals Court and was decided on March 30, 2017 to deny Rehearing in Banc, NORTHERN DISTRICT OF Georgia claim Case 1:15-cv-3400-WHP and 16-11601-AA.

COUNT ONE: VIOLATION OF TITLE 17, UNITED STATES

**CODE 506(A) COPYRIGHT PLAIGERISMS (AGAINST
DEFENDANTS)**

1. Paragraphs 1 through 32 are inclusive, are incorporated by reference as though fully set forth herein and made a part hereof.

Initial COMPLAINT for Civil RICO Remedies

2. Subsequent to PLAINTIFF'S creation and copyrighting of "LK" and "BAGF" DEFENDANT'S Tyler Perry and Oprah Winfrey, having access to "LK" screenplay through accountant Barbara Hunt and "BAGF" book through the Tyler Perry Company, decided to plagiarize the works of these Plaintiff's and countless other Plaintiff's works counterfeiting the original work into a forgery copy that were illegally distributed internationally throughout the world digitally and through U.S. and other mailing companies without written permission or consent of the original owners. These and many other counterfeit intellectual properties aforementioned were used against the owners to enforce slavery for works unpaid violating the RICO ACT in a fashion of which they are organized crime laundering forged goods and drug money into a legal enterprise in which they use harassment, retaliation, threats, intimidation, selling of trade secrets, bribery and a host of other extortions to intimidate witnesses, counsels for Plaintiff's and anyone that opposes them in any way. Several settlement agreements were made by the Defendants on various cases attached as exhibits.

3. Accordingly said defendants are liable to plaintiff for copyright plagiarism pursuant to RICO ACT violating the rights of title 17 of the U.S. Code 501 through 513 and 18 US Code 2319.

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WHEREFORE on count one, PLAINTIFF'S WILLIAM JAMES AND TERRI V. TUCKER formerly (TERRI V. DONALD aka TLO-REDNESS STRICKLAND) demands judgment in THEIR favor and against DEFENDANT'S as follows:

- a) For statutory damages \$150,000.00 per PLAINTIFF, PER DEFENDANT; pursuant to the RICO Act x3 \$450,000.00
- b) For actual damages of Court Cost, Expenses and Private Attorney Fees, per PLAINTIFF, PER DEFENDANT; pursuant to the RICO Act x3.
- c) For Restitution of Earnings from Counterfeit and Plagiarized Copyrighted Intellectual Property all proceeds minus cost incurred to produce illegal counterfeit forgeries of Owners works x3.
- d) For such other relief as this Court may deem proper.

COUNT TWO: ACCOUNTING AND CONSTRUCTIVE TRUST

4. Paragraphs 1 through 32, inclusive are incorporated by reference as though fully set forth herein and made a part hereof
5. PLAINTIFFS is entitled to a full accounting in order to determine the exact nature and amount of revenues generated, and accrued to defendants pertaining to ("Temptations" and "Good Deeds"), said revenues to be set aside and deposited in a separate bank account in constructive trust for PLAINTIFFS for respective works.

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WHEREFORE on Count Two, PLAINTIFF'S WILLIAM JAMES AND TERRI V. TUCKER formerly known as (TERRI V. DONALD-STRICKLAND aka TLO-REDNESS) demands judgment in their favor and against all named Defendant's as follows:

- a) For Tyler Perry and all (ALIASES), Tyler Perry Studios/Company and Lions Gate all subsidiaries of company to file a full accounting listing all gross revenues earned to on "Confessions and Good Deeds" earned in regard to the Film and Motion Pictures, Digital, Downloads, Contracts, Hotels, Retail/Wholesale, International and Domestic, Box Office, Video Rental Stores on respective films "Confessions and "Good Deeds".
- b) For the imposition of a constructive trust in favor of PLAINTIFFS.
- c) For such other relief as the Court may deem proper for acting as "PRIVATE ATTORNEY GENERALS".

COUNT THREE: INJUNCTIVE RELIEF (AGAINST THE DEFENDANTS)

6. Paragraphs 1 through 32 inclusive, are incorporated by reference as though fully set forth herein and made part hereof.
7. PLAINTIFF'S Invoke Sherman Anti-Trust Act, the Hobbs Act, the U.S. Constitution, The Copyrights Act, The Constitution of Georgia, The

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Federal Conspiracy Law and Defendants improper unlawful and repeated actions has caused, and, continues to cause irreparable damage to PLAINTIFFS Character, Film Career, Image, Name, Reputation, Ability to earn future revenues in this industry, emotional and mental distresses, physical distress, relationship distress, undue hardships in work and at home, time and attention from family and friends to divert to investigating and litigating for intellectual property counterfeited and plagiarized. .

8. PLAINTIFFS are entitled to injunctive relief as set forth herein below:
9. PLAINTIFF is entitled to this Court's grant of injunctive relief.

WHEREFORE on Count Three, PLAINTIFF'S WILLIAM JAMES AND TERRI V. TUCKER formerly (TERRI V. DONALD STRICKLAND aka TLO-REDNESS) demands judgment in their favor and against DEFENDANTS as follows:

- a) For the issuance of a permanent injunction requiring the DEFENDANTS to:
 - i) Change illegally obtained copyrights of "Confessions and Good Deeds" over to the respective owners of counterfeit and Plagiarized movies and transfer all rights and licenses with royalties to a trust for PLAINTIFF'S, defendants' must continue

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to market unlawful materials for future Royalty payments to PLAINTIFF'S for copyrighted work; and whatever else the Court deems proper and just.

**COUNT FOUR: EXEMPLARY (PUNITIVE) DAMAGES
(AGAINST THE DEFENDANTS)**

10. Paragraphs 1 through 32 inclusive, are incorporated by reference as though fully set forth herein and made part hereof.
11. Pursuant to the Civil RICO act Remedies authorized by the Federal Statutes at 18 U.S.C. 1961 Plaintiff's request exemplary damages of \$150,000,000.00 per Defendant for pain and suffering, defamation of character, blacklisting filmmakers in the known entertainment industry, financial hardships to keep up with cost of filings, medical and mental distress, attorney fees for Private Attorney Generals, fencing of property, distribution of counterfeited works, plaigerism, forgery, false copyright registrations.

This is the purpose of this act to seek the eradication of an organized crime in the United States by strengthening the legal tools in this evidence in gathering process by establishing a new panel of prohibitions and by providing enhanced sanctions and the new remedies' to deal with the unlawful activities of those

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